



CONFEDERATED TRIBES  
of the  
*Umatilla Indian Reservation*  
Department of Natural Resources  
**CULTURAL RESOURCES  
PROTECTION PROGRAM**  
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Bonneville Power Administration  
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Dear Bonneville Power Administration:

The following are the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Cultural Resources Protection Program's (CRPP) comments regarding the McNary-John Day Transmission Line Project Draft Environmental Impact Statement (DOE/EIS-0332).

We would like to begin by noting that these comments are preliminary and that it is impossible for us to comment on the effects this proposed project will have on cultural resources prior to the publication of the cultural resource survey report prepared for this project. We understand that Jones and Stokes has encountered problems beyond their control in the production of that report, but we wish to be clear that the BPA will need to provide us with an adequate opportunity to comment on that report.

Our initial reaction to the cultural resources sections is that they exclusively focus on Washington. The majority of the project is in the state of Washington, but both ends are in Oregon. The scales of the maps in the draft EIS are such that we cannot tell whether the proposed transmission line will go through known sites in Oregon. Presumably, the cultural resource report will clarify matters. The fact that the Recent Recorded History section does not talk about the cities of Umatilla, McNary, or Rufus, Oregon, the railroad on the Oregon side, or Interstate 84 when the proposed line seems to relate to each is disappointing. We were also surprised to see the main reference to Lewis and Clark was to their stay in Wishram, considerably downstream from the project area, rather than to their visit to Plymouth Island, Blalock Island, or the like.

It is not clear from the Tribal Oral History section whether Jones and Stokes has yet to receive reports from the Warm Springs and the Yakama Nation or if they have decided to only summarize the CTUIR's report. On page 3-77 there is what appears to be a quote from a report by Catherine Dickson that refers to the CTUIR's traditional cultural properties. This quote is actually from a report by Teara Farrow.

The most important part of the cultural resources section of the draft EIS is the mitigation measures. It is unclear when a cultural resource monitor will be present. Will it be during the construction of all new roads and towers, certain new roads, and/or certain towers? Who will make that decision? We would like to remind the BPA that on previous projects where you have agreed to have a cultural resource monitor present, there have been considerable communication difficulties and often the project has taken place

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without the monitor. We hope the BPA will ensure that such a problem will not be encountered on this project.

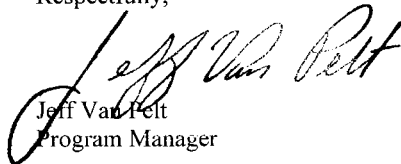
It is apparent that new roads will be constructed as part of this project and presumed that existing roads may be improved. Will the BPA take any measures to ensure that these roads are not accessible to the public? Otherwise increased numbers of people may be able to reach some of these formerly remote sites.

On page 3-84, the draft EIS states, "Of the 14 [newly recorded] cultural resource sites found, 12 require avoidance and two sites require avoidance." Presumably this should match the statement on page S-23, "Of the 14 cultural resource sites found along the corridor, 12 require avoidance and two sites should have cultural resource monitors during construction excavation." The next sentence on page S-23 is, "Of the 10 previously documented cultural resource sites along the corridor, nine require avoidance and one site requires a cultural resource monitor during construction excavation." Back on page 3-84, the corresponding sentence adds a clause: "one site requires avoidance plus a cultural resource monitor during construction excavation." Will the tenth site be avoided or not? Without knowing the character of any of the previously recorded sites or which newly recorded sites will not be avoided, it is impossible to comment on the adequacy of the mitigation measures. Certainly it will not be acceptable for ground disturbing activities to take place in and around Site G, an ethnographic/ethnohistoric cemetery. Does the BPA plan to treat all of these sites as if they are eligible for inclusion in the National Register of Historic Places or will the cultural resource report make recommendations on determinations of eligibility? We are also concerned about the newly recorded sites within existing roads. How will these sites be protected from further damage?

Finally, on page 3-86 under Unavoidable Impacts Remaining after Mitigation, "In the absence of a programmatic agreement, any discovered cultural resources could be subject to mitigation through data recovery." We would like to be clear that we do not support total data recovery except as a last resort.

We look forward to your response to these preliminary comments and to the opportunity to comment on the cultural resource report. If you have any questions, please feel free to contact me or Catherine Dickson, Archaeologist, at (541) 276-3629.

Respectfully,



Jeff Van Pelt  
Program Manager

JVP/ced

cc: Robert Whitlam, Washington State Archaeologist  
Leland Gilson, Oregon State Historic Preservation Office Archaeologist  
Stephen Tromly, Bonneville Power Administration Archaeologist  
Armand Minthorn, Cultural Resources Committee Chair  
Terry Shepherd, Open and Unclaimed Lands Policy Analyst

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TREATY JUNE 9, 1855 ♦ CAYUSE, UMATILLA AND WALLA WALLA TRIBES

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